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9 Attorneys for Plaintiffs, Georgiou Family  
10 Trust; Byron Georgiou individually and as  
11 trustee of the Georgiou Family Trust; and  
Benjamin Hill Realty, LLC

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**  
14

15 Georgiou Family Trust, a Nevada trust;  
16 Byron Georgiou, as an individual and as  
17 trustee of the Georgiou Family Trust;  
18 Benjamin Hill Realty, LLC, a Nevada  
limited liability company.

19 Plaintiffs,

20  
21 v.

22 Phillip V. Ruthen, an individual; Shaw  
23 Industries Inc., a corporation; L. Lake  
24 Jordan, an individual; Suncrest Stone  
Products, LLC, a business entity; Jeffrey W.  
Stevens, an individual; and Does 1-100,

25  
26 Defendants.  
27  
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CASE NO.: 2:21-cv-01060-JCM-DJA

**STIPULATION AND  
ORDER TO  
EXTEND TIME TO FILE  
PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTIONS TO  
DISMISS AND MOTIONS TO  
CHANGE VENUE FROM  
CURRENT DEADLINE OF  
FEBRUARY 24, 2022 AND  
MARCH 4, 2022 TO MARCH  
10, 2022**

**(FIRST REQUEST)**

**TO THE CLERK OF THE ABOVE-TITLED COURT AND TO ALL  
PARTIES AND THEIR ATTORNEYS OF RECORD:**

IT IS HEREBY STIPULATED by and between the parties through their respective counsels that Plaintiffs Georgiou Family Trust; Byron Georgiou; and Benjamin Hill Realty, LLC ("Plaintiffs") shall have through and including March 10, 2022, within which to file and serve a response to the motions of Defendants Phillip V. Ruthen, Shaw Industries Inc. and L. Lake Jordan ("Defendants") to dismiss and/or to change venue ("Motions") (ECF No. 86-88, 91-92).

Further, IT IS HEREBY STIPULATED that Defendants shall have until March 25, 2022 to reply to any and all responses Plaintiffs may file as to the Motions.

The current deadline for Plaintiffs to respond to all five motions is currently set for February 23, 2022 and March 4, 2022. This is the first request to extend the deadline to respond to the Motions.

Pursuant to Local Rule IA 6-1(a), the Parties state the reason for the extension of time is that the attorneys for Plaintiffs still need more time to fully review all five motions and prepare responses thereto given that there are five different motions to respond to all of which raise complicated legal and/or factual issues to address. The motions to change venue also contain extensive factual allegations, multiple exhibits, declarations, and alleged evidence which Plaintiffs need sufficient time to review, create declarations in response to, prepare and locate exhibits in response to, and respond to.

The Parties have therefore agreed to providing Plaintiffs an extension of time to file a response to all five motions. The Parties have entered into an agreement in good faith and not for purposes of delay. It is respectfully requested that the Court approve this stipulation and provide Plaintiffs until March 10, 2022 to respond to the Motions.

Defendants have requested that they be provided time to file and serve their replies after Plaintiffs file their responses until March 25, 2022. The Parties agree and stipulate as such.

**MURCHISON & CUMMING, LLP**

DATED: February 23, 2022

/s/ Pamela C. Chalk

Pamela C. Chalk, Esq.

Anton N. Handal, Esq.

Attorneys for Plaintiffs

**LEWIS ROCA ROTHGERBER CHRISTIE LLP**

DATED: February 23, 2022

/s/ J.Christopher Jorgensen

J.Christopher Jorgensen, Esq.

Chelsee C. Jensen, Esq.

Attorneys for Defendant

Shaw Industries Inc.

**BAILEY ❖ KENNEDY**

DATED: February 23, 2022

/s/ Paul C. William

Paul C. William, Esq.

Dennis L. Kennedy, Esq.

Attorneys for Defendant Phillip V. Ruthen

**LIPSON NEILSON P.C**

DATED: February 23, 2022

/s/ Megan H. Thongkham

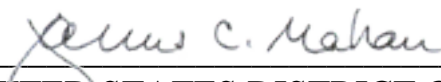
Joseph P. Garin, Esq.

Megan H. Thongkham, Esq.

Attorneys for Defendant L. Lake Jordan

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT COURT JUDGE

DATED: February 23, 2022

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on this date to all counsel of record, if any to date, who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery upon their appearance in this matter.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 23 day of February, 2022.

DATED: February 23, 2022

**MURCHISON & CUMMING, LLP**

/s/ Pamela C. Chalk

Pamela C. Chalk